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     Facsimile: (702) 522-1542
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    jim@oronozlawyers.com
    Attorney for Jacob Lill
 6
                          UNITED STATES DISTRICT COURT
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 8
                                DISTRICT OF NEVADA
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     UNITED STATES OF AMERICA,
                                                 CASE NO: 2:11-cr-00310-JCM-CWH
11
                  Plaintiff,
                                                 UNOPPOSED MOTION TO CONDUCT A
12
                                                 PRE-PLEA PRESENTENCE
                  VS.
                                                 INVESTIGATION REPORT AND
13
     JACOB LILL,
                                                 PROPOSED ORDER
14
                  Defendant.
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           COMES NOW, defendant, JACOB LILL, by and through his counsel, JAMES A.
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     ORONOZ, ESQ., and hereby moves this Court for an Order granting the instant motion for a
19
     Pre-Plea Presentence Investigation Report ("Pre-Plea PSR") to be prepared by the United
20
     States Department of Parole and Probation.
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           1.
                  It is counsel's understanding that Mr. Lill does not have any prior convictions
     that would disqualify him from eligibility under the Safety Valve Provision, listed at U.S.S.G.
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     § 5C1.2(a)(1). However, counsel cannot accurately make this assessment or calculate Mr.
     Lill's criminal history score without the information that would be provided in a Pre-Plea PSR.
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     Mr. Lill's Criminal History category will drastically impact his sentencing exposure,
    negotiations, and his decision as to how he should proceed in this matter. A Pre-Plea PSR will
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     promote judicial economy and aid in the manner in which this case is timely resolved.
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1	2. Therefore, undersigned counsel respectfully requests this Court issue	an Order
2	directing the United States Department of Parole & Probation to conduct a	Pre-Plea
3	Presentence Investigation Report as soon as possible.	
4	3. Undersigned counsel has spoken to the prosecutor, Assistant Unite	d States
5	Attorney James Keller, regarding this request and he has no opposition.	
6		
7	DATED this 22 nd day of July, 2013.	
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9	/s/ James A. Oronoz JAMES A. ORONOZ, Esq.	
10	700 South 3 rd Street	
11	Las Vegas, NV 89101 Counsel for JACOB LILL	
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1	UNITED STATES DISTRICT COURT		
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3	DISTRICT OF NEVADA		
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5	UNITED STATES OF AMERICA,	CASE NO: 2:11-cr-00310-JCM-CWH	
6 7	Plaintiff,	ORDER	
	VS.	ORDER	
8	JACOB LILL,		
9	Defendant.		
10 11			
12 13	IT IS HEREBY ORDERED that that the United States Department of Parole and		
13	Probation will prepare a Pre-Plea Presentence Investigation Report on Defendant JACOB		
15	LILL.		
16	DATED this 23rd day of July	, 2013.	
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19		C.W. Hoffmarl Jr. United States Magistrate Judge	
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1	CERTIFICATE OF ELECTRONIC SERVICE
2	The undersigned hereby certifies that I am an employee of Oronoz & Ericsson
3	L.L.C. and is a person of such age and discretion as to be competent to serve papers.
5	That on July 22, 2013, I served an electronic copy of the above and foregoing
6	UNOPPOSED MOTION TO CONDUCT A PRE-PLEA PRESENTENCE
7	INVESTIGATION REPORT AND PROPOSED ORDER by electronic service (ECF) to
8	the person(s) named below:
9	DANIEL G. BOGDEN
10	United States Attorney 333 Las Vegas Blvd. South, #5000
12	Las Vegas, NV 89101 Counsel for United States
13	JAMES E. KELLER
14	Assistant United States Attorney 100 West Liberty
15	Reno, NV 89501 Counsel for United States
16	
17 18	/s/ Lucas Gaffney, Esq.
19	Employee of the Oronoz Law Offices
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